

# Federal Defenders OF NEW YORK, INC.

Southern District  
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April 23, 2025

**Via ECF and Email**

Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: United States v. Robert Garcia Feliu  
23 Cr. 669 (PGG)**

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

*Paul G. Gardephe*  
**Paul G. Gardephe, U.S.D.J.**

**Dated:**

*The Court will  
conduct a conference in  
this matter on  
June 11, 2025  
at 10:00 A.M.*

Dear Judge Gardephe,

We write to respectfully request that the Court adjourn the motions schedule in the above-captioned case for approximately 30 days, resulting in the following new deadlines: defense motions due May 27, 2025; government response due June 10, 2025, and defense reply due June 17, 2025. The government, by Assistant United States Attorney Justin Horton, has no objection to this request.

Undersigned counsel consulted with our immigration expert regarding potential motions and we discovered that Mr. Garcia's A-file was missing records regarding his 2007 immigration removal proceeding. Therefore, we asked the government to obtain the audio recording of that hearing. The government has made the request to the appropriate officials, but has not yet received it. As such, we ask for the instant adjournment so that we can obtain this record and make our motions accordingly.

Given the nature of this application, Mr. Garcia Feliu consents to the exclusion of time between now and the new motions deadline. See 18 U.S.C. § 3161(h).

Thank you for your consideration.

Respectfully submitted,  
/s/  
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